

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-6246-Cr-DIMITROULEAS

PLAINTIFF, :

DENNIS D'AGOSTA,

DEFENDANT. :

COMES NOW the United States of America, by and through the undersigned Assistant United States Attorney, and respectfully moves this Court to reassign this matter to United States District Judge Donald Middlebrooks and states as follows:



to trial January 16, 2001 before Judge Middlebrooks.

2. The instant Information against defendant Dennis D'Agosta is part of the ongoing investigation as part of Operation Flipper above. As Judge Middlebrooks is most familiar with Operation Flipper, the scheme and artifice to defraud, the extent of the fraud and the involvement of the defendants charged in the Indictment, the admissions of the defendants who have pled guilty to date and their involvements, the Government believes most respectfully that the Information filed against defendant Dennis D'Agosta should be transferred to Judge Middlebrooks in the interest of judicial economy and his knowledge of the investigation and facts surrounding these defendants. The Government respectfully believes the sentences to be imposed on all the defendant should be by one judge most familiar with all the facts and evidence.

3. On August 31, 2000, undersigned counsel spoke with defense counsel, Bo Hitchcock, who advised he was in agreement with the transfer to Judge Middlebrooks.

WHEREFORE, the United States most respectfully moves this Court to reassign this case 00-6246-Cr-Dimitrouleas to Judge Middlebrooks in the interest of judicial economy and practicality and *for no other reasons.*

Respectfully submitted,

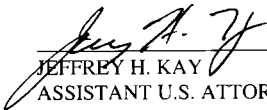
GUY A. LEWIS
UNITED STATES ATTORNEY

By: 

JEFFREY H. KAX
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed on this
31st day of August, 2000 to Bo Hitchcock, Esquire.



JEFFREY H. KAY
ASSISTANT U.S. ATTORNEY